EXHIBIT 2

Conceptual View of Tennessee Clinic Defendants' Discovery/Bellwether Proposal

Common Discovery	\rightarrow	Bellwether Selection	\rightarrow	Case-Specific Discovery	\rightarrow	Bellwether Trials
Initial Disclosures	Consider TN- Specific Mediation	Parties Select 16 Potential Bellwether Trial Cases (Each side		Case-Specific Written Discovery of Four (4)		Conduct Trials of Four (4) Bellwether Trial
Plaintiff Profile Forms	Consider Remand to	chooses Eight (8))		Cases Selected for Trial		Pool cases beginning in December 2016
Collection of Medical Records	TN District Court	Each Side May Strike Four (4) of the Other Side's Eight (8) Cases		Case-Specific Fact Witness Depositions		III December 2010
Common Written Discovery	Motions for Summary Judgment on Common Issues	Court Chooses Four (4) Cases for Bellwether Trials from Eight (8)		Case-Specific Expert Depositions		
Common Fact Witness Depositions		Remaining Cases				
Common Expert Disclosures						
Common Expert Depositions						